

U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

JUN 01 2007

LAWRENCE K. BAERMAN, Clerk
UTICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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	:	
SPERO HARITATOS,	:	
	:	
Plaintiff,	:	
	:	
- against -	:	05 Civ. 930 (DNH-GJD)
	:	
HASBRO, INC.	:	
and TOYS "R" US-NY LLC,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF DEFENDANTS HASBRO, INC. AND TOYS "R" US'S
MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Declarations of Kim J. Landsman, Jill Hambley, and Sean Wiggins, together with the exhibits thereto, and Memorandum of Law and Statement of Material Facts Pursuant to Local Rule 7.1(a)(3), as well as all the pleadings and proceedings heretofore had herein, defendants Hasbro, Inc. and Toys "R" Us – NY LLC ("TRU") will move this Court, at the United States Courthouse, Alexander Pirnie Federal Building, 10 Broad Street, Utica, New York before the Honorable David N. Hurd, on the 13th day of July, 2007, at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order

pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Defendants summary judgment, dismissing Plaintiff's complaint with prejudice, and for such other and future relief as the Court deems just and proper.

Dated: May 30, 2007

Respectfully submitted,

/s/Kim J. Landsman
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Attorneys for Defendant Toys "R" Us

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing **DEFENDANT NOTICE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** to be filed electronically, with copies sent electronically to the counsel set forth below on May 30, 2007:

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...../s/ Michael D. Sant'Ambrogio
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